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CoolVision Ltd. and I.M.L. SLU

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

WAG Acquisition, L.L.C.,

Plaintiff,

v.

Sobonito Investments, LTD., et al.,

Defendant.

Civil Action No. 2:14-cv-01661
(ES)(MAH)

DECLARATION OF
MICHAEL A. INNES IN
FURTHER SUPPORT OF
MOTION FOR THE
ADMISSIONS *PRO HAC VICE*
OF DAVID R. YOHANNAN AND
BETH D. JACOB

MICHAEL A. INNES, declares under penalty of perjury pursuant to
28 U.S.C. §1746 that:

1. I am an attorney-at-law and an associate of the firm of Kelley Drye & Warren LLP, with offices at 1 Jefferson Road, 2nd Floor Parsippany, New Jersey, counsel for Coolvision Ltd. and I.M.L. SLU (collectively “Defendants”). I make

this declaration in support of Defendants' motion for the admissions *pro hac vice* of David R. Yohannan and Beth D. Jacob.

2. I am a member in good standing of the Bar of the State of New Jersey, the State of New York, and of the Bar of this Court.

3. Mr. Yohannan is an attorney-at-law licensed to practice law in the Commonwealth of Virginia; the District of Columbia; United States Court of Appeals Fourth and Federal Circuits; the United States Court of Federal Claims; the United States District Court for the District of Columbia; the United States District Court for the Eastern and Western Districts of Virginia; the United States Patent and Trademark Office; the Supreme Court for the Commonwealth of Virginia; and the United States Court of Federal Claims.

4. Ms. Jacob is an attorney-at-law licensed to practice law in the State of New York, the U.S. Supreme Court, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Federal Circuit, and the United States District Court for the Southern and Eastern Districts of New York

5. In accordance with Local Civil Rule 101.1(c)(2), Mr. Yohannan and Ms. Jacob shall both make a payment to the New Jersey Lawyers' Fund for Client Protection, as provided by New Jersey Civil Practice Rule 1:28-2(a), and shall make such payment for any year in which they continue to represent the aforesaid Defendants in a matter pending in this Court.

6. To the best of my knowledge, Mr. Yohannan and Ms. Jacob have never been the subject of any disciplinary proceeding by any court or other authority, and have never been suspended or disbarred by any court or bar.

7. I know Mr. Yohannan and Ms. Jacob, and believe them to be attorneys of good moral character.

8. I certify that I shall continue to act as counsel-of-record in this action and will comply with Local Civil Rule 101.1(c).

9. I respectfully request that this Court grant this Application to admit Mr. Yohannan and Ms. Jacob *pro hac vice* to participate as counsel for Defendants in the above-captioned action and for all purposes in connection with this action. I attach hereto a proposed consent order for admission *pro hac vice*.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 23, 2016

/s/ Michael A. Innes
Michael A. Innes